

**U. S. DEPARTMENT OF ENERGY
ROCKY FLATS PLANT
ENVIRONMENTAL RESTORATION PROGRAM WEEKLY REPORT
WEEK ENDING AUGUST 21, 1992**

Section I - Interagency Agreement

OU 1 - 881 Hillside

Phase III RFI/RI Field Activities -- Work continues incorporating the OU 1 Phase III RI data into the RFI/RI report. Work on the OU 1 Corrective Measures Study/Feasibility Study (CMS/FS) continues with emphasis on preliminary identification of Applicable or Relevant and Appropriate Requirements (ARARs) and developing a broad list of potential alternatives for screening.

IRA Operations -- Discharge of Effluent Tank 205 which is 100 percent full began this week. Effluent Tank 206 discharge was completed this week. Both influent tanks are empty and the french drain is relatively low, leaving a large capacity to store and treat groundwater.

The French Drain Monitoring Well Installation Program is near completion. All eleven wells have been drilled. Pouring of concrete pads and the development of the wells is in progress.

Feasibility Study -- The contract to drill and collect core samples from the 881 Hillside, IHSS 119.1, is pending. The estimated time to place the contract is a minimum of three weeks. A modification to the existing contract was submitted on August 14, 1992. Additional funding has been requested to cover drilling and core sampling from OU 1 for the Treatability Study/Feasibility Study. The Operational Readiness Review (ORR) required for the drilling and sample collection has been completed. Several items were identified which will be addressed prior to the start of drilling and sample collection.

Comments on the Final Treatability Study Work Plan will be incorporated into the document prior to submittal to the regulatory agencies. Estimated completion date for comment incorporation is August 28, 1992.

OU 2 - 903 Pad, Mound, East Trenches Area

Phase II RFI/RI Alluvial Field Activities -- A Technical Memorandum is being prepared to collect surficial soil samples within the next week. The samples are being taken in support of the HHRA.

Phase II RI Report (Alluvial) and HHRA -- The Draft Final of Technical Memorandum #5, Exposure Scenarios, will be sent to the regulatory agencies the week of August 24, 1992 for review. RFO comments were made and incorporated into the document.

The first draft of Tech Memo #6, Modeling Tech Memo, has been completed. EG&G comments have been incorporated into the document which is being submitted to RFO the week of August 24, 1992 for review.

Feasibility Study (FS) -- The Statement of Work for the FS is complete and ready to begin the procurement cycle. This contract should be awarded under the new MTS subcontractor procurement system.

South Walnut Creek Bench-Scale Treatability Study -- The final OU 2 South Walnut Creek Bench-Scale Treatability Study Report has been reproduced and should be received by RFO during the week of August 24, 1992.

South Walnut Creek IM/IRA (GAC and RADS Removal System) -- The Field Treatability Unit (FTU) collected, treated, and discharged 79,000 gallons of surface water during the week ending August 19, 1992. Twenty-four hour manned operation continues without problems.

The OU 2 generator was taken off plant-site August 12, 1992 to repair the bearing within the unit. It was expected

to be back at OU 2 and operational August 17, 1992. Additional testing was required. The generator is now expected back August 21, 1992. A rental generator is still on-line, and normal operations continue.

A Calgon (manufacturer) representative examined the pinhole leaks that developed in the two on-line GAC upper weld seams August 18, 1992. Calgon states, "The major cause of the failures is galvanic corrosion caused by chlorides in the influent." Samples will be sent to Calgon and an EG&G lab to test for chloride levels. An EG&G corrosion team is also examining the problem. Water droplets from the leaks are still being contained, and the treatment system is operating normally.

A chain was placed across the entrance of the OU 2 weir access driveway on August 20, 1992, to prevent unnecessary traffic from causing damage to underground process piping while it is determined if standing water there is from a seep or some other source.

Subsurface IM/IRA-- The proposed final document was submitted to EPA/CDH on August 20, 1992. HQ comments received late on the 20th could not be incorporated in time to meet the established deadline. These comments will be included in the version to the public on September 10, 1992.

OU 4 - Solar Ponds -- An implementation/coordination meeting for the OU 4 RFI/RI field work was held with EG&G and the subcontractor on August 18, 1992. The meeting covered issues regarding implementation schedule and logistics. Representatives from other EG&G departments, e. g., Health and Safety, attended the meeting to help review their requirements for field projects.

Radiation Worker Training was held on August 19, 1992. Subcontract field personnel attended the training. Radiation Protection Technician training is scheduled for September 3, 1992. Additional training courses for the subcontractor are being scheduled. Training will include Health and Safety, Standard Operating Procedures, and General Employee Training (GET) for subcontractors.

OU 5 - Woman Creek --The final draft documents for Technical Memoranda 1 (TM1), Water and Sediment Sampling Plan, renamed Revised Network Design - Field Sampling Plan to be delivered to the agencies the week of August 17-24, 1992 were received and will be forwarded to the regulatory agencies.

The Health and Safety Plan (HSP) has been under review by EG&G's Industrial Hygiene group since July 28. Final comments were received August 19. The scheduled delivery for the final HSP is about a week behind schedule, caused by a longer review period than anticipated. No IAG milestone impacts are expected from this delay.

OU 6 - Walnut Creek --The Health and Safety Plan (HSP) and the Field Implementation Plan have been submitted to Health and Safety for review and comment. The comments are expected within one week. The HSP must be approved before field work can commence. A draft of the TM outlining reductions in the OU 6 Work Plan was received by RFO. The environmental evaluation request for proposal has been submitted to a subcontractor. A proposal is expected within two weeks.

OU 7 - Present Landfill -- A meeting was held August 19, 1992 among CDH, RFO and EG&G to discuss the definition of a Phase I Baseline Risk Assessment (BRA). Determinations are as follows: (1) Only ingestion, inhalation and dermal absorption of source and soil pathways will be considered during Phase I, (2) Receptors will include the residential exposure scenario, (3) Compliance with CHWA closure requirements will not be considered until ROD, (4) Only primary sources will be considered. Leachate is considered a secondary source, and (5) Groundwater and surface water pathways are excluded from a Phase I BRA.

OU 8 - 700 Area -- CDH and EPA are reviewing the Draft OU 8 Phase I RFI/RI Work Plan submitted on June 22. CDH and EPA were expected to submit comments by July 30, 1992. RFO received notification that CDH and

EPA have not completed their comments on the OU 8 Work Plan. CDH stated that they are about three weeks behind schedule for delivery of formal written comments. Because CDH comments are behind schedule, RFO/EG&G are preparing an extension letter and revised schedule for RFO to notify CDH and EPA that the September 28, 1992 IAG milestone for delivery of the Final Work Plan for OU 8 should be extended given the circumstances.

OU 9 - Original Process Waste Lines -- The Additional Data Compilation (ADC) portion of the Phase I RFI/RI Work Plan for OU 9 is continuing with the search for Original Process Waste Line (OPWL) engineering drawings. The ADC was initiated by EG&G RPD to prevent delay of Work Plan implementation of the Work Plan for OU 9. Similarly, work has begun on the preparation of the detailed radiological survey plan portion of Field Sampling Plan (FSP) Technical Memorandum No. 1 (TM #1). TM #1 must be submitted to and approved by EPA and CDH prior to implementation of the Work Plan. TM #1 will detail Stage 1 of the Phase I RFI/RI Work Plan FSP. OU 9 field work is expected to begin January 1993 after a Health and Safety Plan, TM #1 and Implementation Plan have been submitted to and approved by the appropriate parties.

OU 10 - Other Outside Closures -- The revised Final OU 10 RFI/RI Work Plan was submitted to the regulatory agencies on July 17, 1992. The agencies are reviewing the Work Plan. Approval of the Work Plan is expected by the second week of September 1992.

OU 11 - West Spray Field -- The proposed resolutions for OU 11 Final Phase I RFI/RI Work Plan approval were reviewed by CDH. The work plan was accepted by CDH with only minor comments. Minor revisions to the work plan are in progress.

OU 12 - 400/800 Area -- The Draft RFI/RI Work Plan has been reviewed by CDH and EPA, and comments were received by DOE from both agencies. Initial review of agency comments indicates minimal changes and/or problems with the approach and implementation of the draft plan. EPA had the fewest comments, and in general, is pleased with the approach of the Work Plan and Field Sampling Plan.

CDH comments specifically addressed concerns they have with the Field Sampling Plan as it relates to the sampling methodology for soils. They feel that a change in scope may be required to fully assess the contamination that may lie beneath the buildings which cannot be fully evaluated within the scope of the current Work Plan. A meeting between RFO and EG&G is being scheduled for August 26, 1992 to develop a strategy before a resolution meeting with EPA and CDH which is scheduled for August 27, 1992.

OU 13 - 100 Area -- On August 13, 1992, comments were received from EPA and CDH on the OU 13 Draft Phase I RFI/RI Work Plan. The comments are being reviewed and will be incorporated into the Final Phase I RFI/RI Work Plan which is scheduled for delivery to the regulatory agencies on October 12, 1992.

OU 14 - Radioactive Sites -- The Draft Phase I RFI/RI Work Plan for OU 14 is being reviewed by the regulatory agencies. Revision of the draft document is pending resolution of any comments received from the agencies for incorporation into the Work Plan. Work plan comments were expected from EPA and CDH on August 20. Once comments are received they will be incorporated into the final work plan.

OU 15 - Inside Building Closures -- The Draft Phase I RFI/RI Work Plan was submitted to EPA and CDH on May 27, 1992, approximately five (5) days prior to the IAG due date of June 1, 1992. No additional work is being conducted on OU 15 pending the receipt of comments on the Draft Phase I RFI/RI Work Plan from EPA and CDH.

A letter from EPA and CDH was received on August 14, 1992 regarding the RCRA Closure Plans for OU 15. The IAG superseded the need for RCRA Closure Plans on all OUs except OU 15 per previous interpretation of the IAG by EPA and CDH. According to the agencies' recent letter received on August 14 (dated August 6, 1992) closure of the IHSSs within OU 15 should be handled in a manner similar to the methodology included in the IAG for OUs 4, 7, 9, 10, and 11 (i.e., the RCRA OUs).

OU 16 - Low-Priority Sites -- The Final No Further Action Justification Document was submitted to the regulatory agencies on July 30, 1992. The agencies are reviewing the document. Approval of the document is expected in September 1992.

Sitewide Activities

Treatability Study on Ion Exchange -- The subcontract for the Sitewide Treatability Study on Ion Exchange Work Plan is in place and work on the document has been started by CH₂M Hill.

Soil Washing Demonstration (NRT) -- The single use instruction (SUI) for sampling for this project has been approved and will shortly be issued as a controlled document. Once the SUI has been issued, sampling arrangements will be made. Sampling is anticipated to take place following Labor Day.

Magnetic Separation -- The contract for this project is in the final stages of approval. Once the contract has been approved, sampling can be arranged and the samples will be shipped to LANL for the test work.

Other Activities

Landfill Decontamination Facility -- Expected construction startup for the landfill decontamination facility has been tentatively moved back to early spring.

231 GAC Unit Installation -- Radian Corporation (contractor) is designing the GAC Unit at this time. Submittals for Inspection and Testing, Project Plan, Submittal Schedule, and a Quality Assurance Plan are being reviewed.

Office of Technology Development (EM-50) Limited Support of RFP -- Several Technical Task Plans (TTP) supporting ER technology development under the sponsorship of the Hanford site VOC Integrated Demonstration seem to be on hold pending HQ-EM-50 support. This is an ER sponsored program utilizing technologies that have been developed in other laboratories. The need is to demonstrate the effectiveness of these technologies at RFP with the goal of implementing appropriate technologies in the field at RFP. The project is also designed to demonstrate faster and less expensive site characteristics and chemical analyses techniques. There is strong reluctance on the part of EM-50 in that they feel the focus at RFP is on production and waste management activities, not on ER activities. The resolution of the issue of HQ-EM-50 support of RFP ER activities is being pursued with EG&G/RFO/HQ upper management.

Technical Review Group -- The monthly Technical Review Group (TRG) meeting was held August 19, 1992 at the Interlocken facility. Approximately 14 people representing local municipalities, environmental groups, DOE, CDH, EPA, and EG&G were in attendance. The meeting contained a brief overview of OUs 14 and 15 presented by the respective OU managers. TRG members were to comment on OU work plans, but they did not have time to review the plans, so questions were minimal. TRG members did ask a lot of questions about a possible IAG "renegotiation" and how IAG work would be integrated with D&D in the PA. The only responses came from the EPA representative who hinted that EPA was posturing to "renegotiate the IAG".

An RFO representative led the meeting and suggested that DOE/EG&G turn the leadership of the group over to a TRG-appointed person. The TRG is working on developing a new charter to match the needs of the group, which seem to be centered around how to capture relevant information in a timely manner in order to give input to DOE/EG&G early in the cleanup process (e.g. before the documents go final).

Section II - Pondcrete Activities

Project Management -- On June 29, 1992 RFO notified EG&G of the need for increased attention to the cleanup of the solar ponds. Since that time there has been an increase in matrix and assigned personnel to the program. Additional office space has been allocated onsite and more subcontractor forces have been mobilized. Three full time and two part time contractor personnel have already been added to the project. Other contractor personnel are being identified for assignment to specific tasks.

Section III - Surface Water Management

EPA has informed the Rocky Flats Office (RFO) by letter that discharges from the surface water retention ponds which are now regulated by the National Pollutant Discharge Elimination System (NPDES) will be regulated through the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and/or the Resource Conservation and Recovery Act (RCRA). This change in regulatory status, which was originally proposed by EPA in a December 19, 1991 meeting attended by RFO, EG&G, the State of Colorado and EPA, was made formal in a June 26, 1992 letter from EPA to RFO.

RFO management and legal met on August 7, 1992 to discuss the consequences of regulating the surface water retention pond discharges under CERCLA. The outcome of the meeting is that RFO will prepare a pond CERCLA issue paper for Headquarters and will contact EPA and CDH regarding IM/IRA scoping activities for managing the ponds under CERCLA. Scoping activities with EPA/CDH are exploratory and no RFO acknowledgment that pond discharge regulation under CERCLA is acceptable will be made.

RFO is requesting permission from the Colorado Department of Health to spray evaporate over the landfill pond and to transfer water from ponds B-1 and B-2 to pond A-2 for spray evaporation. The landfill pond water quality is good but the water in pond B-2 has some trace organics. A risk assessment for spray evaporation of pond B-2 water has been completed and shows values well below the acceptable carcinogenic range and Hazard Index.

Option B Federal Agency Meeting with Local City Officials and Congressman Skaggs

A meeting was held August 17, 1992, with the local heads of the Environmental Protection Agency, the Bureau of Reclamation, the Corps of Engineers, the Fish and Wildlife Service, and the Department of Energy, along with officials of the local communities and Congressman Skaggs to discuss regulatory issues concerning Option B. This conference was a follow-up to a meeting on August 14, 1992 of the Executive Review Committee, formed with the local directors of other Federal Agencies that have environmental involvement with the local cities' Option B water project. The Executive Review Committee was conceptualized and initiated by the Manager of the Rocky Flats Office to facilitate communication and coordination among the agencies, and to aid the cities in complying with all applicable environmental laws. After each agency outlined their regulatory requirements to the city officials and Congressman Skaggs, all participants agreed to work closely together to facilitate completing the environmental steps needed before work on the project can proceed.

Option B Federal Agency Meeting on Regulatory Criteria

On August 21, 1992, representatives from the Environmental Protection Agency, the Fish and Wildlife Service, the Department of Energy, and the City of Westminster met to identify specific criteria necessary to satisfy various regulatory requirements applicable to the implementation of Option B. The meeting was held in a "Quality Action Team" format (based on Total Quality Management), and facilitated by Mr. Lou Johnson, EPA. The outcome of the meeting was a roadmap of the various environmental issues to be addressed, and the critical pathways to be followed under both non-CERCLA and CERCLA scenarios. Specific timelines will also be developed by the cities for the critical pathways to better determine the schedule for the project.

Section IV - Transition/Decontamination and Decommissioning

Section V - Meetings

OU 4 - Solar Ponds Fieldwork Kickoff -- A kick-off meeting was scheduled and held on August 13, 1992 among EG&G and the subcontractor responsible for implementation of the OU 4 Work Plan to review the procedures/issues for starting field work. Additional training courses for the RFI/RI subcontractor are being scheduled. Training will include Radiation Worker Training, Health and Safety, Standard Operating Procedures, and General Employee Training for subcontractors.

OU 7 Work Plan Meeting -- A meeting was held August 19, 1992 among CDH, RFO and EG&G to discuss the definition of a Phase I Baseline Risk Assessment (BRA). Determinations are as follows: (1) Only ingestion, inhalation and dermal absorption of source and soil pathways will be considered during Phase I, (2) Receptors will include the residential exposure scenario, (3) Compliance with CHWA closure requirements will not be considered until ROD, (4) Only primary sources will be considered. Leachate is considered a secondary source, and (5) Groundwater and surface water pathways are excluded from a Phase I BRA.

OU 12 Work Plan Meetings -- A meeting between RFO and EG&G is being scheduled for August 26, 1992 to develop a strategy before a resolution meeting with EPA and CDH which is scheduled for August 27, 1992. The Draft RFI/RI Work Plan has been reviewed by CDH and EPA, and comments were received by DOE and EG&G from both agencies. CDH comments specifically addressed concerns they have with the Field Sampling Plan as it relates to the sampling methodology for soils. They feel that a change in scope may be required to fully assess the contamination that may lie beneath the buildings which cannot be fully evaluated within the scope of the current Work Plan.

Section VI - Future

- NEPA Documents Scheduled for Delivery to HQ: None
- August-October 1992 IAG Milestones Scheduled for Delivery from RFO to EPA/CDH:

No IAG Table 6 Milestones are scheduled for delivery to EPA/CDH in August

OU Milestone Date Due to EPA/CDH

08 Submit Final Phase I RFI/RI Work Plan	Sep. 28, 1992
12 Submit Final Phase I RFI/RI Work Plan	Oct. 5, 1992
13 Submit Final Phase I RFI/RI Work Plan	Oct. 12, 1992
15 Submit Final Phase I RFI/RI Work Plan	Oct. 26, 1992
01 Submit Draft Phase I RFI/RI Report	Oct. 28, 1992*

*extended from original IAG date of July 30, 1992 with approval from EPA/CDH